

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

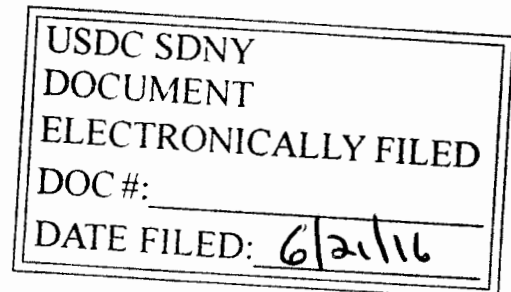
UNITED STATES OF AMERICA

- v. -

JESSE RIVERA,
a/k/a "Angel Carrera,"
a/k/a "Jessito,"
EDWIN LEON,
a/k/a "Bear,"
JEFFREY SERRANO,
a/k/a "Jeff,"
ANTHONY MORENO,
a/k/a "Ant,"
VARMEL RHAMES,
a/k/a "Mel,"
REMEL HAYNES,
a/k/a "Mel," and
JUAN MENDEZ,
a/k/a "Pito."

SEALED
SUPERSEDING INDICTMENT

S4 15 Cr. 877 (PAE)



COUNT ONE

(Hobbs Act Robbery Conspiracy)

The Grand Jury charges:

1. From at least in or about September 2014, up to and including at least in or about February 2016, in the Southern District of New York and elsewhere, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," EDWIN LEON, a/k/a "Bear," JEFFREY SERRANO, a/k/a "Jeff," ANTHONY MORENO, a/k/a "Ant," VARMEL RHAMES, a/k/a "Mel," REMEL HAYNES, a/k/a "Mel," and JUAN MENDEZ, a/k/a "Pito," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section

1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, RIVERA, LEON, SERRANO, MORENO, RHAMES, HAYNES, MENDEZ, and others known and unknown, agreed to rob drug dealers in the Bronx, New York, of drugs and of cash that was proceeds from interstate drug trafficking.

(Title 18, United States Code, Section 1951.)

COUNT TWO
(Hobbs Act Robbery)

The Grand Jury further charges:

2. On or about January 20, 2015, in the Southern District of New York, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," and EDWIN LEON, a/k/a "Bear," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, in the vicinity of East 142nd Street and Concord Avenue in the Bronx, New York, RIVERA, LEON, and others known and unknown, robbed a marijuana dealer at gunpoint of marijuana, cash and other items.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE
(Attempted Hobbs Act Robbery)

The Grand Jury further charges:

3. On or about April 1, 2015, in the Southern District of New York, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," EDWIN LEON, a/k/a "Bear," and JEFFREY SERRANO, a/k/a "Jeff," the defendants, and others known and unknown, unlawfully and knowingly attempted to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would thereby have obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, in the vicinity of Metcalf Avenue and Gleason Avenue in the Bronx, New York, RIVERA, LEON, SERRANO, and others known and unknown, attempted to rob a marijuana dealer at gunpoint of marijuana, cash and other items.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FOUR
(Hobbs Act Robbery)

The Grand Jury further charges:

4. On or about October 17, 2015, in the Southern District of New York, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," ANTHONY MORENO, a/k/a "Ant," VARMEEL RHAMES, a/k/a "Mel," and REMEL HAYNES, a/k/a "Mel," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and

affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, in the vicinity of 3340 Bailey Avenue in the Bronx, New York, RIVERA, MORENO, RHAMES, HAYNES, and others known and unknown, robbed a drug dealer of cocaine, a firearm, and other items.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FIVE
(Hobbs Act Robbery)

The Grand Jury further charges:

5. On or about February 10, 2016, in the Southern District of New York, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," and JUAN MENDEZ, a/k/a "Pito," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, in the vicinity of 2175 Lacombe Avenue in the Bronx, New York, RIVERA, MENDEZ, and others known and unknown, robbed drug dealers at gunpoint of crack cocaine, marijuana, heroin, and other items.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT SIX
(Firearms Offense)

The Grand Jury further charges:

6. From at least in or about September 2014, up to and including at least in or about February 2016, in the Southern District of New York and elsewhere, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," EDWIN LEON, a/k/a "Bear," JEFFREY SERRANO, a/k/a "Jeff," and JUAN MENDEZ, a/k/a "Pito," the defendants, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the robbery conspiracy charged in Count One of this Indictment; with respect to RIVERA and LEON, also during and in relation to the robbery charged in Count Two of this Indictment; with respect to RIVERA, LEON and SERRANO, also during and in relation to the attempted robbery charged in Count Three of this Indictment; and with respect to RIVERA and MENDEZ, also during and in relation to the robbery charged in Count Five of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes, knowingly did possess firearms, which were brandished, and did aid and abet the same.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)

FIRST FORFEITURE ALLEGATION

7. As the result of committing the offense charged in Count One of this Indictment, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," EDWIN LEON, a/k/a "Bear," JEFFREY SERRANO, a/k/a "Jeff," ANTHONY MORENO, a/k/a "Ant," VARMEL RHAMES, a/k/a "Mel," REMEL HAYNES, a/k/a "Mel," and JUAN MENDEZ, a/k/a "Pito," the defendants, shall

forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

SECOND FORFEITURE ALLEGATION

8. As the result of committing the offense charged in Count Two of this Indictment, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," and EDWIN LEON, a/k/a "Bear," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

THIRD FORFEITURE ALLEGATION

9. As the result of committing the offense charged in Count Three of this Indictment, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," EDWIN LEON, a/k/a "Bear," and JEFFREY SERRANO, a/k/a "Jeff," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

FOURTH FORFEITURE ALLEGATION

10. As the result of committing the offense charged in Count Four of this Indictment, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," ANTHONY MORENO, a/k/a "Ant," VARMEL RHAMES, a/k/a "Mel," and REMEL HAYNES, a/k/a "Mel," the defendants, shall forfeit to the United

States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

FIFTH FORFEITURE ALLEGATION

11. As the result of committing the offense charged in Count Five of this Indictment, JESSE RIVERA, a/k/a "Angel Carrera," a/k/a "Jessito," and JUAN MENDEZ, a/k/a "Pito," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

Substitute Assets Provision

12. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

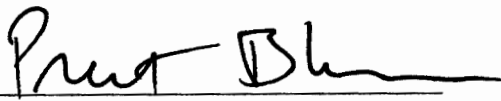

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p)

and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853(p); and
Title 28, United States Code, Section 2461(c).)


FOREPERSON


PREET BHARARA 
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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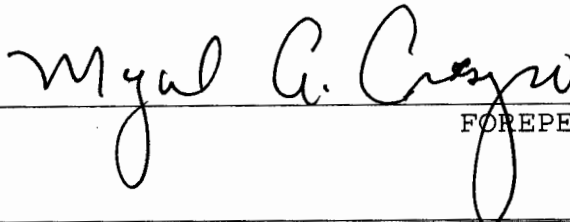
SUPERSEDING INDICTMENT

S4 15 Cr. 877
(18 U.S.C. §§ 1951, 924(c) and 2.)

PREET BHARARA

United States Attorney.

TRUE BILL



FOREPERSON

June 21, 2016

Filed Sealed Further Superseding Indictment
U.S.M.S. - Debra Freeman